

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 2434, 8890, 13147

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**This filing relates to the
Commonwealth.**

**INFORMATIVE MOTION
REGARDING MOTION REQUESTING
RELIEF OF STAY UNDER 362(D)(1) OF THE BANKRUPTCY CODE**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act*, respectfully submits this Informative Motion (the “Motion”) regarding the *Motion Requesting Relief of Stay under 362(d)(1) of the Bankruptcy Code* [ECF No. 2434] (the “Lift Stay Motion”), the *Order Scheduling Further Proceedings Regarding Motion Requesting Relief from Automatic Stay* [ECF No. 8890], and the *Order in Connection with Informative Motion Regarding Motion Requesting Relief of Stay Under 362(d)(1) of the Bankruptcy Code (Docket Entry No. 12795)* [ECF No. 12841]. In support of this Motion, the Commonwealth respectfully states as follows:

1. The parties finalized a stipulation memorializing the agreement in principle to resolve the Lift Stay Motion, which the Oversight Board approved prior to the COVID-19 pandemic. The parties have agreed to an extension of the deadline to file the stipulation and to adjourn the hearing on the Lift Stay Motion to the October 28, 2020 omnibus hearing, to allow the Commonwealth and Oversight Board to continue to focus on Puerto Rico’s efforts to address and evaluate the impact of the COVID-19 pandemic. The parties will file either the stipulation memorializing their agreement in principle or a status report on or before October 15, 2020. The parties intend the extension requested herein to be the final extension, subject to any intervening events and developments on the Island that may unfold over the next months.

2. Accordingly, the parties request that the Court adjourn the July 29, 2020 hearing on the Lift Stay Motion to the omnibus hearing scheduled for October 28, 2020 at 9:30 a.m. (AST).

Dated: July 15, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ehud Barak

Martin J. Bienenstock (*pro hac vice*)

Paul V. Possinger (*pro hac vice*)

Ehud Barak (*pro hac vice*)

Jeffrey W. Levitan (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Attorneys for the Financial Oversight and
Management Board as representative for the
Debtor*

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Co-Attorneys for the Financial Oversight
and Management Board as representative
for the Debtor*